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Attorneys for Plaintiff
Kimberley Ann Woo, Trustee Of The Wilbur
And Dolores L. Woo 1987 Irrevocable Trust

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

KIMBERLEY ANN WOO, AS TRUSTEE OF
THE WILBUR AND DOLORES L. WOO 1987
IRREVOCABLE TRUST,

Plaintiff,

vs.

THE PRUDENTIAL INSURANCE COMPANY
OF AMERICA, and DOES 1 through 10,
Defendants.

CASE NO. C 06-3545 CRB

**STIPULATION AND [PROPOSED]
ORDER RE EXTENSION OF TIME TO
CONDUCT MEDIATION**

Complaint Filed: May 5, 2006

STIPULATION

WHEREAS, pursuant to this Court's August 14, 2006 Order Referring this Case to

1 Mediation, the parties attempted to schedule this case for mediation within 90 days of the
 2 issuance of that order and on October 26, 2006, this Court assigned a new mediator, Arnold
 3 Haims, Esq., due to the mutual unavailability of the originally assigned mediator, Jay Folberg,
 4 and the parties;

5 WHEREAS, the parties have scheduled a mediation with Mr. Haims for December 6,
 6 2006. However, plaintiff has determined that it is advisable to include a third party, (Richard S.
 7 Linder and his insurer), in mediation of this matter. Mr. Linder was involved in the drafting of
 8 the trust and procurement of the policy at issue. Plaintiff's counsel is conferring with Mr. Linder
 9 and his insurance carrier and/or counsel concerning Mr. Linder's voluntary participation in
 10 mediation and has requested that defendant agree to at least a 90 day continuance of the
 11 mediation so that Mr. Linder and his insurer can participate in the mediation in a meaningful
 12 manner. Plaintiff's counsel has also conferred with Mr. Haims concerning continuation of the
 13 mediation and Mr. Haims has advised he has no objection to doing so;

14 WHEREAS, defendant does not object to the requested continuance of the mediation in
 15 this matter.

16 IT IS HEREBY STIPULATED AND AGREED THAT:

17 The time within which the parties be required to conduct a mediation in this matter be
 18 extended at least 90 days from the date of this stipulation.

19 DATED: November 27, 2006

GORDON & REES, LLP

20 By: /s/

21 DONALD W. REES
 22 LESLIE K. CRARY

23 Attorneys for Defendant
 24 PRUDENTIAL INSURANCE COMPANY OF
 25 AMERICA
 26
 27
 28

1 DATED: November 27, 2006

CARR, McCLELLAN, INGERSOL,
THOMPSON & HORN
Professional Law Corporation

4 By: /s/
KEITH P. BARTEL
DAVID M. KING
JEFFREY R. LOEW

7 Attorneys for Plaintiff
KIMBERLEY ANN WOO, AS TRUSTEE OF
8 THE WILBUR AND DOLORES L. WOO 1987
9 IRREVOCABLE TRUST

12 I, LESLIE CRARY, hereby attest that David M. King, counsel for plaintiff, concurs in
13 the filing of this Stipulation.

14 DATED: November 27, 2006

By: /s/
LESLIE K. CRARY

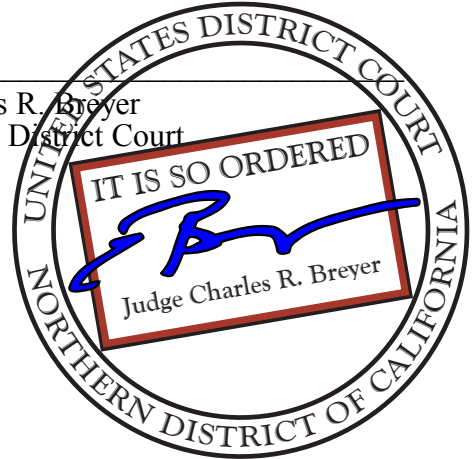
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ORDER

IT IS HEREBY ORDERED that the deadline for mediation of this case is continued to
February 26, 2007.

DATED: November 28, 2006

Judge Charles R. Breyer
United States District Court



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